MEMO ENDORSED

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February 22, 2021

OFFICES IN: MIDDLETOWN, N.Y. NEWBURGH, N.Y. POUGHKEEPSIE, N.Y. SPRING VALLEY, N.Y. NEW YORK, N.Y.

Hon. Kenneth M. Karas United States District Court Judge United States District Court Southern District of New York 300 Quarropas Street White Plains, New York 10601

Via ecf

Re: Krauss, etc. o/b/o A.K. v.

Rhinebeck Central School District Civil Actions No. 7:20-CV-04207 (KMK) &

7:19-cv-11029 (KMK)

Dear Judge Karas:

The Plaintiff requests that an additional adjournment of the motion practice be granted in the above matters. A proposal has been made for a global settlement of both proceedings and the matter is being presented to the administration of the School District's board for consideration.

While we acknowledge that the Court directed no further adjournments in this matter, we would hope the opportunity to resolve the entirety of both cases will be allowed to be explored in as prompt a manner as possible. Our earlier adjournment requests were due to the various personnel transition of both myself and the trial counsel in this matter from a firm that dissolved. Until that was resolved. I was unable to move forward with any motions or settlement discussions. Those issues have been resolved and I am authorized at this point to explore settlement of the matter.

I have, of course, spoken with counsel for the defendant who consents to this request.

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Hon. Kenneth M. Karas, USDC Judge Krauss etc., o/b/o A.K. v. Rhinebeck Central School District Civil actions No. 7:20-cv-04207, 7:19-cv-11029-KMK February 22, 2021 Page 2 of 2

The district's Board of Education meets on the fourth Tuesday of each month. I believe that any settlement would have to be presented at the March meeting. Accordingly, I would ask that Plaintiff's submission be adjourned to April 6, 2021. The District's opposition to May 18 and reply by June 18.

I thank the Court in advance for its courtesies in this matter.

Very Truly Yours,

Granted.

Thomas R. Davis

So Ordered.

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2/22/21

c.c. Mark Rushfield, Esq. mrushfield@shawperlson.com